

### REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-27 are pending examination.

#### Rejections Under 35 U.S.C. § 112

**Claims 1-14 and 21-23** stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. **Claims 24-27** stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. These rejections are respectfully traversed.

Regarding the rejection of claims 1-14 and 21-23, in particular independent **claims 1 and 8**, Applicant respectfully submits that the claims as revised overcome the Office's rejection of the claims.

Regarding the rejection of claims 24-27, in particular independent **claim 24**, the Office maintains certain limitations of the claim do not comply with the written description requirement. The Applicant disagrees for the following reasons.

Claim 24 includes the limitation "instructing the reinsurer to pair a payment with one or more upcoming events, the instructing performed by the insurer using a server associated with the reinsurer." The Instant Specification discloses "a customer (e.g., an insurance company) and a business (e.g., a reinsurer) to distribute risk." (See *paragraph [0026]*.) In the indicated limitation of claim 24, the customer is "instructing the reinsurer to pair a payment." The Specification of the Instant Application discloses the use of "a system 400 that includes a server 240." The "server 240 can be owned, operated, or otherwise maintained by or

on behalf of business 230." (See *paragraph [0030]*.) The Specification also discloses: "[t]he customer is requested to present pairing advice – technical bookings information. If the business is unable to pair a customer's payment to open current account bookings (e.g., due to non-use of payment advice functionality), the customer can do so manually using the pairing advice process." (See *paragraph [0061]*.) Therefore, although the insurer makes the decision to "pair payment," the reinsurer provides the system (e.g., reinsurer's server) that enables the insurer to request the pair payment task and that executes the pair payment task on behalf of the insurer. Thus, Applicant respectfully submits, that at least the limitation "instructing the reinsurer to pair a payment with one or more upcoming events, the instructing performed by the insurer using a server associated with the reinsurer." is supported by the written description.

Therefore, for at least the foregoing reasons, the rejections of claim 1-14 and 21-23 and 24-27 are improper. Accordingly, withdrawal of the rejections are respectfully requested.

**Claims 8-14 and 23** stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite. This rejection is respectfully traversed.

**Claim 8** recites "means for configuring the server to perform a process associated with the customer account." The indicated language is no longer found in claim 8. Thus, the Applicant respectfully submits that the rejection is now moot. Applicant respectfully submits that claim 8 complies with the requirements of 35 U.S.C. §112, second paragraph.

Accordingly, withdrawal of the rejection of the rejection under 35 U.S.C. §112, second paragraph is respectfully requested.

Rejections Under 35 U.S.C. § 102

**Claims 1-20 and 23-27** stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication Number to 2002/0143584 A1 naming Lundegren (hereinafter, "Lundegren"). This rejection is respectfully traversed.

Amended **claim 1** of the present Application recites:

A system for transacting business between a customer and a business, the system comprising:

a server used by the business and being accessible by the customer, wherein the business is a reinsurer and the *customer is an insurer*; and

a customer account housed on the server, the customer account having access to internal records associated with the customer account on the server, wherein the server includes automated instructions that, when executed by the server, configure the server to: allow the customer to advise the business of an upcoming payment for an upcoming event, to request a payment from the business for a previous event, or to pair a payment with one or more previous events,

*wherein the automated instructions are adapted to present, on a computer graphical user interface for view and use by the customer, a list of open current account bookings of the customer,*

*wherein the open current account bookings are associated with more than one insurance policy, and*

*wherein, using the list, the customer is able to pair a payment associated with a certain insurance policy with a previous event associated with the certain insurance policy. (Emphasis added.)*

Lundegren does not disclose at least the emphasized limitations of claim

1. In particular, FIG. 3 of Lundegren "represents a bid listing screen 75 accessible by a participating reinsurer." (See *paragraph [0056], Lundegren*.) Lundegren does not disclose that the screen 75 is available for viewing by an insurer (i.e., a customer). However, this is of little surprise, as screen 75 is

provided to enable a *reinsurer* to makes bids on requests for reinsurance. Therefore, screen 75 is of no interest to an insurer and Lundegren does not disclose that the screen 75 is offered for display to an insurer. Therefore, Lundegren does not disclose "wherein the automated instructions are adapted to present, on a computer graphical user interface for view and use by the customer, a list of open current account bookings of the customer" and/or "wherein the open current account bookings are associated with more than one insurance policy," as is recited in claim 1. Note, as is recited in claim 1, the "customer is an insurer."

The Office maintains that FIG. 2 illustrates/discloses the third limitation emphasized in the above-reproduced claim 1. FIG. 2 in Lundegren provides a user interface that may be used by a client to provide "necessary information for submitting a request for bids though [*sic*] a submission screen 30." (See *paragraph [0040], Lundegren.*) The screen 30 is used to create a reinsurance request for bids. However, nothing on this screen relates to "using the list, the customer is able to pair a payment associated with a certain insurance policy with a previous event associated with the certain insurance policy," as is recited in claim 1. This is also not surprising, as screen 30 is an event that takes place before policy even exists.

Therefore, for at least the foregoing reasons, the rejection of claim 1 is improper.

**Dependent claims 1-7** depend from claim 1. The rejection with regard to these claims should be withdrawn by virtue of the dependency. Moreover, these claims recite features that, when taken together with those of claim 1, are not disclosed by Lundegren.

For at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claims 1-7.

Amended **Claim 8** of the present Application recites:

A system for transacting business between a customer and a business, the system comprising:

a server used by the business and being accessible by the customer, wherein the business is a reinsurer and the *customer is an insurer*; and

a customer account housed on the server, the customer account being configured to permit access to individual records associated with the customer account, the including means for configuring the server to perform a process associated with the customer account,

*wherein the server includes automated instructions that are adapted to present, on a computer graphical user interface for view and use by the customer, a list of open current account bookings of the customer,*

*wherein the open current account bookings are associated with more than one insurance policy, and*

*wherein, using the list, the customer is able to pair a payment associated with a certain insurance policy with a previous event associated with the certain insurance policy. (Emphasis added.)*

Lundegren does not disclose at least the emphasized limitations of claim 8. Specifically, FIG. 3 of Lundegren "represents a bid listing screen 75 accessible by a participating reinsurer." (See paragraph [0056], Lundegren.) Lundegren does not disclose that the screen 75 is available for viewing by an insurer (i.e., a customer). However, this is of little surprise, as screen 75 is provided to enable a *reinsurer* to makes bids on requests for reinsurance. Therefore, screen 75 is of no interest to an insurer and Lundegren does not disclose that the screen 75 is offered for display to an insurer. Therefore, Lundegren does not disclose "wherein the automated instructions are adapted to present, on a computer graphical user interface for view and use by the

customer, a list of open current account bookings of the customer" and/or "wherein the open current account bookings are associated with more than one insurance policy," as is recited in claim 8. Note, as is recited in claim 8, the "customer is an insurer."

The Office maintains that FIG. 2 illustrates/discloses the third limitation emphasized in the above-reproduced claim 8. FIG. 2 in Lundegren provides a user interface that may be used by a client to provide "necessary information for submitting a request for bids though [sic] a submission screen 30." (See *paragraph [0040], Lundegren.*) The screen 30 is used to create a reinsurance request for bids. However, nothing on this screen relates to "using the list, the customer is able to pair a payment associated with a certain insurance policy with a previous event associated with the certain insurance policy," as is recited in claim 8. This is also not surprising, as screen 30 is an event that takes place before policy even exists.

Therefore, for at least the foregoing reasons, the rejection of claim 8 is improper.

**Dependent claims 9-14 and 23** depend from claim 8. The rejection with regard to these claims should be withdrawn by virtue of the dependency. Moreover, these claims recite features that, when taken together with those of claim 8, are not disclosed by Lundegren.

For at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claims 8-14 and 23.

**Claim 15** of the present Application recites:

A method of transacting business between a customer and a business, the method comprising:

accessing an existing customer account, including internal records of the business, on a server used by the business, wherein the business is a reinsurer and the customer is an insurer;

*accessing a computer graphical user interface that displays a list of open current account bookings of the customer, wherein the open current account bookings are associated with more than one insurance policy, and*

instructing the business to make an upcoming payment for an upcoming event, to request a payment from the business from a previous event, or to pair a payment with one or more upcoming events,

wherein instructing the business to pair a payment with one or more upcoming events comprises using the list to pair a payment associated with a certain insurance policy with an upcoming event associated with the certain insurance policy. (Emphasis added.)

Lundegren does not disclose at least the emphasize limitation of claim 15.

The Office maintains that FIG. 6 of Lundegren illustrates/discloses the emphasized limitation. FIG. 6 illustrates "a bid proposal presentation screen 160 that includes a Bid Summary section 163." (See paragraph [0074], Lundegren.) The section 163 includes "a listing 167 for each bidding reinsurer of critical terms" for a given bid. A listing 180 provides additional information about the bidding reinsurers. However, the screen 160 does not illustrate "a computer graphical user interface that displays a list of open current account bookings of the customer, wherein the open current account bookings are associated with more than one insurance policy," as is recited in claim 15. In particular, nothing shown on screen 160 relates to "current account bookings," or for that matter, bookings that "are associated" with an insurance policy associated with an insurer. Therefore, for at least the foregoing reasons, the rejection of claim 15 is improper.

**Dependent claims 16-20** depend from claim 15. The rejection with regard to these claims should be withdrawn by virtue of the dependency.

Moreover, these claims recite features that, when taken together with those of claim 15, are not disclosed by Lundegren.

For at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claims 15-20.

Amended **Claim 24** of the present Application recites:

A method comprising:

remotely accessing an insurer account by an insurer, including internal records of a reinsurer providing coverage to the insurer for clients of the insurer, the account being stored on a server associated with the reinsurer;

*accessing a computer graphical user interface that displays a list of open current account bookings associated with the insurer, wherein the open current account bookings are associated with an insurance policy in which the reinsurer provides reinsurance coverage to the insurer, and*

instructing the reinsurer to pair a payment with one or more upcoming events, the instructing performed by the insurer using the server associated with the reinsurer, the instructing performed by the insurer using the server associated with the reinsurer,

*wherein instructing the reinsurer to pair a payment with one or more upcoming events comprises using the list to pair a payment associated with a certain insurance policy of the insurer with an upcoming event associated with the certain insurance policy in accordance with an existing reinsurance policy between the insurer and the reinsurer. (Emphasis added.)*

Lundegren does not disclose at least the emphasized limitations of claim 24. The Office maintains that FIG. 6 of Lundegren illustrates/discloses the first emphasized limitation. FIG. 6 illustrates "a bid proposal presentation screen 160 that includes a Bid Summary section 163." (*See paragraph [0074], Lundegren.*) The section 163 includes "a listing 167 for each bidding reinsurer of critical terms" for a given bid. A listing 180 provides additional information about the bidding reinsurers. However, the screen 160 does not illustrate "a computer graphical user interface that displays a list of open current account bookings



associated with the insurer, wherein the open current account bookings are associated with an insurance policy in which the reinsurer provides reinsurance coverage to the insurer," as is recited in claim 24. In particular, nothing shown on screen 160 relates to "current account bookings," or for that matter, bookings that "are associated" with an insurance policy associated with an insurer.

Applicant has carefully considered the entirety of Lundegren and finds nothing disclosing "wherein instructing the reinsurer to pair a payment with one or more upcoming events comprises using the list to pair a payment associated with a certain insurance policy of the insurer with an upcoming event associated with the certain insurance policy in accordance with an existing reinsurance policy between the insurer and the reinsurer," as is recited in claim 24

Therefore, for at least the foregoing reasons, the rejection of claim 24 is improper.

**Dependent claims 25-27** depend from claim 24. The rejection with regard to these claims should be withdrawn by virtue of the dependency. Moreover, these claims recite features that, when taken together with those of claim 25, are not disclosed by Lundegren.

For at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claims 24-27.

*Claim Rejections Under 35 U.S.C. § 103*

**Claim 21** stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Lundegren in view of the Office's unilateral determination identification of Applicant Admitted Prior Art (hereinafter "AAPA"). **Claim 22** stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Lundegren in view of U.S.

Patent Application Publication Number to 2002/0143584 naming Goino (hereinafter, "Goino"). Applicant respectfully traverses these rejections.

**Claim 21** depends from claim 1. The rejection with regard to this claim should be withdrawn by virtue of the dependency. Moreover, this claim recites features that, when taken together with those of claim 1, are not rendered obvious by Lundegren in view of AAPA.

**Claim 22** depends from claim 1. The rejection with regard to this claim should be withdrawn by virtue of the dependency. Moreover, this claim recites features that, when taken together with those of claim 1, are not rendered obvious by Lundegren in view of Goino.

In accordance with the foregoing, Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. § 103(a) rejections.

Conclusion

In accordance with the foregoing remarks, Applicant believes that the pending claims are allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney at the provided email address.

Respectfully Submitted,

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